

Remarks

Claims 35-46 are pending in this application. Claims 1-34 are cancelled, claims 35-46 are newly added, and no claims are amended. No new subject matter has been added. In view of foregoing amendments and following comments, allowance of all the claims pending in the application is respectfully requested.

Drawings

The one (1) attached sheet of drawings in APPENDIX B reflects an amendment to FIG. 5. Specifically, the Filter Information Source 521 is included in the drawing. This change is reflected also in the Substitute Specification, at page 27, lines 3-5, filed herewith.

Applicants submit that the changes to the drawing figures described above do not constitute the addition of new matter, as support for the instant amendments is provided throughout the as-filed Specification and claims. For example, support for a filter information source, such as a lookup table, may be found in the Specification at page 25, lines 6-11, and claims 11 and 28. Accordingly, Applicants respectfully request that the Examiner approve the changes to the drawings.

Specification

The Examiner has objected to the use of the trademarks Java, Enterprise JavaBeans, EJB, JavaServer Pages, and JSP. The Specification has been amended to respect the proprietary nature of these marks, and generic language has been included to accompany or replace their usage throughout the Specification.

The Examiner has objected to the incorporation of U.S. Patent Application Serial Number 08/931,878 as improper because it was not commonly owned with the instant application at the time of invention. The Specification has been amended to incorporate issued U.S. Patent No. 6,629,153, and is therefore proper.

The Specification has been amended to reflect the amendments made to the drawings. Support for these amendments are addressed above, in the section entitled ***Drawings***.

Rejections Under 35 U.S.C. § 112

Claims 4 and 21 contain the trademark/trade name "Enterprise JavaBeans". According to the Examiner, where a trademark or trade name is used in a claim as a limitation to identify or describe a particular material or product, the claim allegedly does not comply with the requirements of 35 U.S.C. 112, second paragraph.

Claims 6 and 23 contain the trademark/trade name "JavaServer Pages".

Claims 7 and 24 contain the trademark/trade name "Java".

The cancellation of these claims has rendered these rejections moot.

Rejections Under 35 U.S.C. § 102

Claims 1, 2, 8, 10, 13, 14, 18, 19, 25, 27 30, and 31 are rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent 5,675,801 to Lindsey .

Applicants disagree with rejections of claims 1, 2, 8, 10, 13, 14, 18, 19, 25, 27 30, and 31 as set forth by the Examiner. However, the cancellation of claims 1, 2, 8, 10, 13, 14, 18, 19, 25, 27 30, and 31 has rendered the rejection of these claims moot.

Rejections Under 35 U.S.C. § 103

Claims 3, 15, 20, and 32 are rejected under 35 U.S.C. 103(a) as being unpatentable over Lindsey as applied to claims 1 and 18 respectively above, and further in view of U.S. Patent 6,463,440 to Hind et al.

Claims 4 and 21 are rejected under 35 U.S.C. 103(a) as being unpatentable over Lindsey as applied to claim 1 above, and further in view of "Enterprise JavaBeans™" by Sun Microsystems.

Claims 5-7 and 22-24 are rejected under 35 U.S.C. 103(a) as being unpatentable over Lindsey and applied to claim 1 above, and further in view of U.S. Patent 6,715,129 to Hind.

Claims 9, 12, 26 and 29 are rejected under 35 U.S.C. 103(a) as being unpatentable over Lindsey and applied to claim 1, further in view of "XSL Transformations (XSLT)" by W3C.

Claims 11, 16, 17, 28, 33 and 34 are rejected under 35 U.S.C. 103(a) as being unpatentable over Lindsey as applied to claim 1 above, further in view of "Computer User's Dictionary" by Microsoft Press.

Applicants disagree with rejections of claims 3-7, 9, 11, 12, 15-17, 20-24, 26, 28, 29, and 32-34 as set forth by the Examiner. However, the cancellation of claims 3-7, 9, 11, 12, 15-17, 20-24, 26, 28, 29, and 32-34 has rendered the rejection of these claims moot.

Newly Added Claims

Claims 35-46 are supported by the drawings, Specification, and claims as originally filed and have been newly added by this Amendment to further clarify the invention of the instant application.

Independent claims 35 and 43 recite, among other things, selecting a plurality of included filters from a plurality of filters for inclusion in a conversion pipeline configuration, based at least in part on individual filter functionalities associated with the included filters, and determining a filter order for the included filters, based at least in part on the individual filter functionalities. Independent claim 39 recites a pipeline assembler that selects a plurality of included filters from a plurality of filters based at least in part on configuration data and individual functionalities of the filters, and determines a filter order for the included filters based at least in part on the configuration data and the individual functionalities of the included filters, among other things. In an exemplary embodiment, a pipeline assembler may read configuration parameters corresponding to user specified data to choose appropriate filters and pipes for inclusion in a conversion pipeline. The pipeline assembler may read the configuration parameters and consult a lookup table that stores information about filters and pipes (see the Specification at page 31, lines 5-12). The pipeline assembler may then arrange the proper filters in an appropriate order (see the Specification at page 31, lines

12 and 13). Filters may include various functionalities. For example a filter may extract generated source code nodes from an XML tree and write them out as files (see the Specification at page 34, lines 14-19); determine whether each source code file that it finds is a candidate for updating a project file, and integrating appropriate source code files into the project file (see the Specification at page 35 lines 1-8); determining whether each source code file that it finds is a candidate for updating a deployment-descriptor file, and integrating appropriate source code files into the deployment-descriptor file; or provide other functionalities (see the Specification at page 35, line 9 – page 36, line 8).

In contrast, the system disclosed in Lindsay receives object oriented program specifications and converts them into source code for a target language (see Lindsey at col. 2, line 67 – col. 3, line 2). The system includes a set of templates for each target language (see Lindsey col. 3, lines 2 and 3). Each template corresponds to a “primitive” construct in the target language that includes fragments of source code (see Lindsey at col. 3, lines 3-5). The system of Lindsey includes a means for determining whether each object in the object oriented program specification corresponds to one of the primitive constructs of the target language (see Lindsey at col. 3, lines 5-7), and means for mapping each of the objects to the proper fragments of source code corresponding to the appropriate primitive constructs of the target language (see Lindsey at col. 3, lines 11-14). If an object does not directly relate to a primitive construct of the target language, Lindsey teaches a method of breaking the object down recursively into the set of objects contained in the originally selected object. Each object in this set of objects is then processed just as an originally selected object would be (see Lindsey at col. 3, lines 7-11). The source code produced by this method is parsed using a means for parsing the resulting fragments of source code to complete a section of source code in the target language for executing the desired designated computer programming function represented by the originally selected object(s) in the object oriented program specifications (see Lindsey at the Abstract).

Lindsey appears to include a plurality of sets of templates (templates 66, 68, and 70 of FIG. 3), one for each target language that the system is capable of converting

objects into, that may be selectively used by the system. However, these are to be used only as a reference by the means for determining and means for mapping, and do not perform any actions with respect to the data being converted. The order of the means for determining, means for mapping, means for recursively breaking down an object that does not correspond to a primitive construct in the target language, and the means for parsing are always performed in the same order (see Lindsey at FIGS. 4A-5B and col. 7, line 47 – col. 10 line 52). The system always includes the same components (recursion generator and parser of generator engine 64 shown in FIG. 3 of Lindsey) for actually converting the object oriented user selections. Therefore, Lindsey does not teach or suggest selecting a plurality of included filters from a plurality of filters for inclusion in a conversion pipeline configuration, based at least in part on individual filter functionalities associated with the included filters, and determining a filter order for the included filters, based at least in part on the individual filter functionalities.

The Examiner appears to acknowledge that Lindsey is deficient because it fails to disclose the use of XML data nodes and/or an XSL engine. This feature is no longer claimed. Therefore, the rejection based on Hind '440 is moot. Furthermore, Hind '440 remains deficient because it is silent with respect to selecting a plurality of included filters from a plurality of filters for inclusion in a conversion pipeline configuration, based at least in part on individual filter functionalities associated with the included filters, and determining a filter order for the included filters, based at least in part on the individual filter functionalities. Thus, Applicants respectfully submit that Lindsey and Hind '440, both alone and in combination, are deficient because they fail to disclose the claimed invention.

The Examiner appears to acknowledge that Lindsey is deficient because it fails to disclose the generation of servlets, Java™ servlets, and/or JavaServer Pages™. This feature is no longer claimed. Therefore, the rejection based on Hind '129 is moot. Furthermore, Hind '129 remains deficient because it is silent with respect to selecting a plurality of included filters from a plurality of filters for inclusion in a conversion pipeline configuration, based at least in part on individual filter functionalities associated with the included filters, and determining a filter order for the included filters, based at least in

part on the individual filter functionalities. Thus, Applicants respectfully submit that Lindsey and Hind '129, both alone and in combination, are deficient because they fail to disclose the claimed invention.

The Examiner appears to acknowledge that Lindsey is deficient because it fails to disclose the modification of XSLT templates. This feature is no longer claimed. Therefore, the rejection based on W3C is moot. Furthermore, W3C remains deficient because it is silent with respect to selecting a plurality of included filters from a plurality of filters for inclusion in a conversion pipeline configuration, based at least in part on individual filter functionalities associated with the included filters, and determining a filter order for the included filters, based at least in part on the individual filter functionalities. Thus, Applicants respectfully submit that Lindsey and W3C, both alone and in combination, are deficient because they fail to disclose the claimed invention.

The Examiner appears to acknowledge that Lindsey is deficient because it fails to disclose the use of a lookup table, data streaming, and/or error checking. The Examiner therefore has combined Microsoft with Lindsey to cure this deficiency. However, Microsoft is silent with respect to selecting a plurality of included filters from a plurality of filters for inclusion in a conversion pipeline configuration, based at least in part on individual filter functionalities associated with the included filters, and determining a filter order for the included filters, based at least in part on the individual filter functionalities. Thus, Applicants respectfully submit that Lindsey and Microsoft, both alone and in combination, are deficient because they fail to disclose the claimed invention.

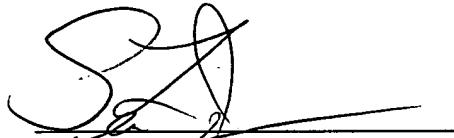
In view of the foregoing differences between claims 35, 39, and 43 and the cited art, Applicants respectfully submit that claims 35, 39, and 43 are believed to be allowable over these references. Further, claims 36-38, 40-42, and 44-46 are believed to be allowable at least by virtue of their dependency.

A full and complete response has been made to the outstanding Office Action and, as such, the application is in condition for allowance. Notice to that effect is respectfully requested.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Dated: August 6, 2004

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'S. Ingram', with a horizontal line drawn underneath it.

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